

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIGHTHOUSE FINANCIAL GROUP,	:	Civil Action No. 1:11-cv-00398-GBD
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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ETHAN GOLD, Individually and on Behalf of	:	Civil Action No. 1:11-cv-01162-NRB
All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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DECLARATION OF THEODORE J. PINTAR IN SUPPORT OF PLAINTIFFS'  
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT ROYAL BANK OF  
SCOTLAND GROUP PLC'S MOTION TO DISMISS THE  
CONSOLIDATED AMENDED COMPLAINT

I, THEODORE J. PINTAR, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, one of the counsel of record for plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit 1: Excerpts from Financial Services Authority Board Report, *The Failure of the Royal Bank of Scotland*, December 2011;
- Exhibit 2: FSA Statement on Johnny Cameron, May 18, 2010;
- Exhibit 3: Appendix 2 to The Royal Bank of Scotland Group plc's 2008 Year-End Financial Statements;
- Exhibit 4: John Glover, *UBS, Barclays Can't 'Wash Hands' of Subprime*, *CreditSights Says*, Bloomberg, July 5, 2007;
- Exhibit 5: Peter Toeman, *Royal Bank of Scotland – 6x is hard to argue with; update from Neutral to Overweight*, *TP 540p*, HSBC Global Research, December 6, 2007;
- Exhibit 6: Carla Antunes de Silva & Ashley P. Stuart, *Royal Bank of Scotland – 2007 FY Results – Waiting for Transparency and Clarity . . . Remains Neutral*, JP Morgan Securities Ltd., March 3, 2008; and
- Exhibit 7: Excerpts from Jerald E. Pinto, CFA, Elaine Henry, CFA, Thomas R. Robinson, CFA & John D. Stowe, CFA, *Equity Asset Valuation* (2d ed. 2007).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this March 13, 2012, at San Diego, California.

s/ THEODORE J. PINTAR  
\_\_\_\_\_  
THEODORE J. PINTAR

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 13, 2012.

s/ THEODORE J. PINTAR  
THEODORE J. PINTAR

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## Mailing Information for a Case 1:11-cv-00398-GBD

### Electronic Mail Notice List

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### Manual Notice List

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,

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